

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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OKSANA S. BAIUL and OKSANA, LTD,

Plaintiffs,

– against –

STEPHEN DISSON and DISSON SKATING, LLC,

Defendants.
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Civil Action No.:
13-cv-02208-KBF

**ANSWER
TO AMENDED
COMPLAINT**

ECF CASE

JURY DEMANDED

Defendants, STEPHEN DISSON and DISSON SKATING, LLC (“Defendants”), by their attorneys, TACOPINA, SEIGEL & TURANO, P.C., answering plaintiffs’ (“Plaintiffs”) Amended Complaint (“Complaint”), respectfully state as follows:

1. Denies any knowledge or information sufficient to form a belief as to the allegations contained in paragraph 1 of the Complaint.
2. Denies any knowledge or information sufficient to form a belief as to the allegations contained in paragraph 2 of the Complaint.
3. Denies each and every allegation contained in paragraph 3 of the Complaint and respectfully refers all questions of law to the Court.
4. Admits paragraph 4 of the Complaint, except denies that he is the CEO and respectfully refers the parties and the Court to the alleged terms of the alleged document to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.
5. Admits paragraph 5 of the Complaint, except denies the phrase “several years” and respectfully refers the parties and the Court to the alleged terms of the alleged document to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

6. Denies paragraph 6 of the Complaint as the allegations contained therein need to response.

7. Admits paragraph 7 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

8. Admits paragraph 8 of the Complaint, except denies the phrase “several years” and respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

9. Denies any knowledge or information sufficient to form a belief as to the allegations contained in paragraph 9 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

10. Denies each and every allegation contained in paragraph 10 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

11. Denies each and every allegation contained in paragraph 11 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

12. Denies each and every allegation contained in paragraph 12 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

13. Denies each and every allegation contained in paragraph 13 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

14. Denies each and every allegation contained in paragraph 14 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

15. Denies each and every allegation contained in paragraph 15 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

16. Denies each and every allegation contained in paragraph 16 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

17. Denies each and every allegation contained in paragraph 17 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

18. Denies each and every allegation contained in paragraph 18 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

19. Denies each and every allegation contained in paragraph 19 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

20. Denies each and every allegation contained in paragraph 20 of the Complaint, except

respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

21. Denies each and every allegation contained in paragraph 21 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

22. Denies each and every allegation contained in paragraph 22 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

23. Denies each and every allegation contained in paragraph 23 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

24. Denies each and every allegation contained in paragraph 24 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

25. Denies each and every allegation contained in paragraph 25 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

26. Denies each and every allegation contained in paragraph 26 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

27. Denies each and every allegation contained in paragraph 27 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which

Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

28. Denies each and every allegation contained in paragraph 28 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

29. Denies each and every allegation contained in paragraph 29 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

30. Denies each and every allegation contained in paragraph 30 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

31. Denies each and every allegation contained in paragraph 31 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

32. Denies each and every allegation contained in paragraph 32 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

33. Denies each and every allegation contained in paragraph 33 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

34. Denies each and every allegation contained in paragraph 34 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court

35. Denies each and every allegation contained in paragraph 35 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

36. Denies each and every allegation contained in paragraph 36 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court

37. Denies each and every allegation contained in paragraph 37 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

38. Denies each and every allegation contained in paragraph 38 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

39. Denies each and every allegation contained in paragraph 39 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

40. Denies each and every allegation contained in paragraph 40 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

41. Denies each and every allegation contained in paragraph 41 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

42. Denies each and every allegation contained in paragraph 42 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

43. Denies each and every allegation contained in paragraph 43 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

44. Denies each and every allegation contained in paragraph 44 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

45. Denies each and every allegation contained in paragraph 45 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

ANSWERING THE FIRST CAUSE OF ACTION

46. Repeats and reiterates each and every denial, response and allegation made above with the same force and effect as though the same were set forth at length herein in answer to paragraph number 46 of the Complaint.

47. Denies each and every allegation contained in paragraph 47 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

48. Denies each and every allegation contained in paragraph 48 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

49. Denies each and every allegation contained in paragraph 49 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

50. Denies each and every allegation contained in paragraph 50 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

51. Denies each and every allegation contained in paragraph 51 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

52. Denies each and every allegation contained in paragraph 52 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

53. Denies each and every allegation contained in paragraph 53 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court

54. Denies each and every allegation contained in paragraph 54 of the Complaint, except refers all questions of law to the Court.

55. Denies each and every allegation contained in paragraph 55 of the Complaint, except refers all questions of law to the Court.

56. Denies each and every allegation contained in paragraph 56 of the Complaint, except refers all questions of law to the Court.

ANSWERING THE SECOND CAUSE OF ACTION

57. Repeats and reiterates each and every denial, response and allegation made above with the same force and effect as though the same were set forth at length herein in answer to paragraph number 57 of the Complaint.

58. Denies each and every allegation contained in paragraph 58 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

59. Denies each and every allegation contained in paragraph 59 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

60. Denies each and every allegation contained in paragraph 60 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

61. Denies each and every allegation contained in paragraph 61 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

62. Denies each and every allegation contained in paragraph 62 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

63. Denies each and every allegation contained in paragraph 63 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

64. Denies each and every allegation contained in paragraph 64 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court

65. Denies each and every allegation contained in paragraph 65 of the Complaint, except refers all questions of law to the Court.

66. Denies each and every allegation contained in paragraph 66 of the Complaint, except refers all questions of law to the Court.

67. Denies each and every allegation contained in paragraph 67 of the Complaint, except refers all questions of law to the Court.

ANSWERING THE THIRD CAUSE OF ACTION

68. Repeats and reiterates each and every denial, response and allegation made above with the same force and effect as though the same were set forth at length herein in answer to paragraph number 68 of the Complaint.

69. Denies each and every allegation contained in paragraph 69 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

70. Denies each and every allegation contained in paragraph 70 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

71. Denies each and every allegation contained in paragraph 71 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

72. Denies each and every allegation contained in paragraph 72 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

73. Denies each and every allegation contained in paragraph 73 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

74. Denies each and every allegation contained in paragraph 74 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

75. Denies each and every allegation contained in paragraph 75 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court

76. Denies each and every allegation contained in paragraph 76 of the Complaint, except refers all questions of law to the Court.

77. Denies each and every allegation contained in paragraph 77 of the Complaint, except refers all questions of law to the Court.

78. Denies each and every allegation contained in paragraph 78 of the Complaint, except refers all questions of law to the Court.

ANSWERING THE FOURTH CAUSE OF ACTION

79. Repeats and reiterates each and every denial, response and allegation made above with the same force and effect as though the same were set forth at length herein in answer to paragraph number 79 of the Complaint.

80. Denies each and every allegation contained in paragraph 80 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

81. Denies each and every allegation contained in paragraph 81 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

82. Denies each and every allegation contained in paragraph 82 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

83. Denies each and every allegation contained in paragraph 83 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

84. Denies each and every allegation contained in paragraph 84 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

85. Denies each and every allegation contained in paragraph 85 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court.

86. Denies each and every allegation contained in paragraph 86 of the Complaint, except respectfully refers the parties and the Court to the alleged terms of the alleged documents to which Plaintiffs refer in such paragraph and respectfully refers all questions of law to the Court